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UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

SAMSARA INVESTMENTS LLC SERIES 4,

Case No. 2:24-cv-01859-JCM-EJY

Plaintiff,

vs.

THE DEPARTMENT OF HOUSING AND
URBAN DEVELOPMENT; ROE BUSINESS
ENTITIES I through X, inclusive,

Defendants.

**STIPULATION AND ORDER TO EXTEND
DEADLINE TO FILE JOINT DISCOVERY
PLAN AND RESPONSE TO MOTION TO
DISMISS**

(Second Request)

Plaintiff, Samsara Investments LLC Series 4 (“Samsara”) and Defendant, The Department of Housing and Urban Development (“HUD” or “Federal Defendant”) (collectively the “Parties”) hereby represents and stipulate to the following extension of time. This is the Parties’ second stipulation to extend time.

1. By way of background, HUD is the beneficiary of a partial claim deed of trust in this matter.

2. On October 11, 2024, HUD filed a motion to dismiss Samsara’ complaint. (ECF No. 3).

3. After Federal Defendant filed its motion to dismiss, Samsara’s Counsel discovered that Bank of America, N.A. was the beneficiary of the first deed of trust recorded against the subject Property, and Samsara settled with Bank of America by way of Samsara paying a sum certain in exchange for reconveyance of the first deed of trust prior to the filing of this lawsuit. (ECF No. 11).

1 4. On November 6, 2024, Samsara's Counsel informed Federal Defendant's Counsel
2 of this discovery. Federal Defendant's Counsel requested a copy of the settlement agreement.

3 5. On November 8, 2024, the Parties stipulated to stay discovery and other case-
4 related deadlines (ECF No. 11) due to the above discovery, which the Court granted on November
5 12, 2024 (ECF No. 12).

6 6. On January 6, 2025, Samsara's Counsel provided Federal Defendant's Counsel
7 with the settlement agreement at issue.

8 7. On January 16, 2025, Samsara's Counsel and Federal Defendant's Counsel
9 conducted a phone conference discussing the settlement agreement, underlying issues affecting
10 this instant litigation, and the path forward, to include possible informal resolution.

11 8. After this conference, Federal Defendant's Counsel conferred with HUD to gather
12 more information to determine the appropriate next steps. Federal Defendant anticipates being able
13 to gather this information in 2 weeks or less.

14 9. After this conference, Samsara's Counsel conferred with Samsara to discuss
15 potential resolution. Samsara anticipates being able to make this determination in 2 weeks or less.

16 10. Based on the foregoing, the Parties are diligently working toward determining
17 whether resolution can be reached. As such, the Parties stipulate and agree to stay discovery and
18 current deadlines by two weeks, as follows:

19 A. The deadline for the Parties to hold a discovery conference be extended
20 from January 22, 2024 to February 5, 2025;

21 B. The deadline for Samsara to file its response to HUD's motion to dismiss
22 be extended from February 6, 2025 to February 20, 2025; and

23 C. The deadline for HUD to file a reply in support of its motion to dismiss be
24 extended from February 21, 2025 to March 7, 2025.

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11. Based on the foregoing, the Parties have good cause to request this short extension of time and submit this stipulation in good faith.

Respectfully submitted this 21st day of January 2025.

SUE FAHIMI
Acting United States Attorney

HANKS LAW GROUP

/s/ Reem Blaik
REEM BLAIK
Assistant United States Attorney

/s/ Karen L. Hanks
KAREN L. HANKS
Attorney

Attorneys for Federal Defendant

Attorneys for Plaintiff

IT IS SO ORDERED.

DATE: January 22, 2025


UNITED STATES MAGISTRATE JUDGE